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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

SOHAIL MAMDANI,

Defendant.

CASE NO. 1:22-CR-00279-JLT-SKO

STIPULATION REGARDING CONTINUANCE OF
STATUS CONFERENCE; ORDER

DATE: April 5, 2023

TIME: 1:00 p.m.

COURT: Hon. Sheila K. Oberto

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. On October 27, 2022, the defendant was arraigned before this Court and eventually ordered released.

2. This matter was previously set for a status hearing before this Court on April 5, 2023 and time was excluded under the Speedy Trial Act until April 5, 2023.

3. By this stipulation, and at the request of the Court, both parties now move to continue the status hearing until May 31, 2023.

4. The parties agree and stipulate, and request that the Court find the following:

a) The parties stipulate that the delay is required to allow the defense reasonable time for preparation and review of discovery, and for the government's continuing investigation of the case. The parties further agree that the interests of justice served by granting this

1 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18
2 U.S.C. § 3161(h)(7)(A).

3 b) Initial discovery associated with this case has been either produced directly to
4 counsel and/or made available for inspection and copying. The government has already provided
5 the defense with a plea offer in this case.

6 c) Counsel for defendant desires additional time to consult with his client, to review
7 the current charges, to conduct investigation and research related to the charges, and to discuss
8 the government's proposed resolution with his client.

9 d) Counsel for defendant believes that failure to grant the above-requested
10 continuance would deny him the reasonable time necessary for effective preparation, taking into
11 account the exercise of due diligence.

12 e) The government does not object to the continuance.

13 f) The requested date is a mutually agreeable date for both parties.

14 g) The parties agree that good cause exists for the extension of time, and that the
15 extension of time would not adversely affect the public interest in the prompt disposition of
16 criminal cases. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §
17 3161, et seq., within which trial must commence, the time period of April 5, 2023 to May 31,
18 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161 (h)(1)G), 3161(h)(7)(A),
19 and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the
20 parties' request on the basis of the Court's finding that the ends of justice served by taking such
21 action outweigh the best interest of the public and the defendant in a speedy trial.

22 h) Nothing in this stipulation and order shall preclude a finding that other provisions
23 of the Speedy Trial Act dictate that additional time periods are excludable from the period within
24 which a trial must commence.

25
26 IT IS SO STIPULATED.
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28

1 Dated: March 28, 2023

PHILLIP A. TALBERT
United States Attorney

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3 /s/ ALEXANDRE DEMPSEY
ALEXANDRE DEMPSEY
Assistant United States Attorney

4
5 Dated: March 28, 2023

6 /s/ KEVIN ROONEY
KEVIN ROONEY
Counsel for Defendant
SOHAIL MAMDANI

7
8
9 **ORDER**

10 IT IS SO ORDERED. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C.
11 § 3161, et seq., within which trial must commence, the time period of April 5, 2023, through May 31,
12 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161 (h)(1)G), 3161(h)(7)(A), and
13 3161(h)(7)(B)(i) and (iv). At the request of the parties, the April 5, 2023, status hearing in the above
14 case is **CONTINUED** until May 31, 2023.

15
16 DATED: 3/29/2023

17 Sheila K. Oberto
18 THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE